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GOOGLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 3:10-cv-03561-WHA

**DECLARATION OF REID MULLEN IN
SUPPORT OF GOOGLE'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

Judge: Hon. William Alsup

Date Comp. Filed: October 27, 2010

1 I, Reid Mullen, declare as follows:

2 1. I am an associate in the law firm of Keker & Van Nest LLP, counsel to Google
3 Inc. ("Google") in the present case. I submit this declaration in support of Google's
4 Administrative Motion to Seal Portions of its Opposition To Motion To Exclude Portions of the
5 Expert Reports of Gregory K. Leonard and Alan J. Cox. I have knowledge of the facts set forth
6 herein, and if called to testify as a witness thereto could do so competently under oath.

7 2. Exhibits D, E, F and G to the Declaration of David Zimmer in Support of
8 Google's Opposition To Motion To Exclude Portions of the Expert Reports of Gregory K.
9 Leonard and Alan J. Cox ("Zimmer Decl.") each contain detailed and confidential information
10 concerning Google's internal strategy in developing the Android code, including consideration of
11 alternative programming languages and approaches not involving the Java language or a virtual
12 machine. Google does not make this information available to the public. Public disclosure of
13 this confidential information would cause great and undue harm to Google.

14 3. The redacted portions of Google's Opposition To Motion To Exclude Portions of
15 the Expert Reports of Gregory K. Leonard and Alan J. Cox, and Exhibits J and K to the Zimmer
16 Decl. contain information that Oracle has designated as "CONFIDENTIAL" or "HIGHLY
17 CONFIDENTIAL – ATTORNEY'S EYES ONLY" pursuant to the stipulated protective order in
18 this case. Google takes no position as to whether disclosure of that material would cause harm to
19 Oracle.

20 I declare under penalty of perjury that the foregoing is true and correct and that this
21 declaration was executed at San Francisco, California on October 28, 2011.

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23 By: /s/ Reid Mullen
24 REID MULLEN
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